

## **U.S.** Department of Justice

United States Attorney Eastern District of New York

CK/LXN F.#2008R01875 271 Cadman Plaza East Brooklyn, New York 11201

July 31, 2012

## By Federal Express & ECF

Joel S. Cohen, PC 225 Broadway, Suite 1203 New York, NY 10007

Re: United States v. Chang

Criminal Docket No. 11-0067 (S-2) (SJ)

Dear Mr. Cohen:

Enclosed please find one CD containing the government's continued discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The government hereby also requests reciprocal discovery.

The materials include:

- (a) Documents that appear to relate to lectures at St. Johns's University (129949-130206);
- (b) Bank records from Hong Kong (130207-130358);
- (c) Bank records from Turkey (130359-130382);
- (d) Bank and credit card records from Taiwan (130383-130477; 130478-130595);
- (e) Documents from a student who worked for the defendant (130596-130613); and
- (f) Additional documents relating to GDIF (130614-130620).

If you have any questions or further requests, please do not hesitate to contact us.

Very truly yours,

LORETTA E. LYNCH United States Attorney Eastern District of New York 2

By: /s/
Charles Kleinberg

Lan Nguyen
Assistant U.S. Attorneys
(718) 254-6012/6162

Enclosures

CC: Clerk of Court (SJ) (w/o enclosures)